

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 2046).

Michael Mercer, Treasurer
Credit Union Legislative Action
Council of CUNA
PO Box 576
Washington, DC 20044

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Reference: April Monthly Report (3/1/99-3/31/99), May Monthly Report (4/1/99-

4/30/99) and September Monthly Report (8/1/99-8/31/99)

Dear Mr. Mercer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses what appear to be in-kind contributions made on behalf of several federal candidates where the original payments for the goods and services have been made by individuals and entities other than your committee (pertinent portions(s) attached). Please explain the circumstances surrounding these transactions.

Also, be advised that the payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee, is a contribution. 11 CFR§116.5(b) Note, these transactions may affect the aforementioned individuals' and entities' contribution limitations to those candidates.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our